

FRANKFURT KURNIT KLEIN & SELZ, P.C.

488 Madison Avenue
New York, New York 10022
Tel: (212) 980-0120
Fax: (347) 438-2085

Heather B. Kamins
Direct dial: (212) 826-5554
E-mail: hkamins@fkks.com

October 19, 2007

Via Facsimile No. 212-805-4258

Honorable Debra C. Freeman

Daniel Patrick Moynihan

United States Courthouse, Courtroom 17A

500 Pearl St., Room 525

New York, NY 10007

OCT 19 2007

CHAMBERS OF
DEBRA FREEMAN
U.S.M.J.

MEMO ENDORSED

Re: Ward Media, Inc. v. Creoscope Media, Inc. and Frischman Enterprises, Inc. d/b/a/ PCSecurityShield (07-Civ.-5470)

Dear Judge Freeman:

We represent Plaintiff, Ward Media, Inc. ("Ward Media") in the above-referenced matter. This letter is being sent with the consent of counsel for Defendant, Frischman Enterprises, Inc. d/b/a/ PCSecurityShield ("Frischman Enterprises"). We write pursuant to Rule 6(b), Federal Rules of Civil Procedure and in accordance with the individual practices of your Court, to request that the Court extend the time provided to the parties to file all motions to amend or motions to add parties.

Counsel for Frischman Enterprises has agreed to a one-week extension of this deadline. The original deadline for filing all motions to amend or motions to add parties was set for Friday, October 5, 2007. We have asked for two previous extensions with opposing counsel's consent, which the Court granted. We ask that the deadline be extended from October 19, 2007 until October 26, 2007.

We are currently in settlement talks with Frischman Enterprises, and we hope to resolve the dispute shortly without both sides incurring additional costs in litigation. If, however, we are unable to resolve the dispute, we may seek to amend the complaint.

Respectfully submitted,



Heather B. Kamins

cc: Jeffrey Heller, Esq. (By fax)
Melissa Corwin, Esq. (By fax)

SO ORDERED: DATE: 10/19/07

.....
DEBRA FREEMAN

UNITED STATES MAGISTRATE JUDGE